

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

<b>IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION</b>	<b>MDL No. 2875</b>
<b>THIS DOCUMENT RELATES TO ALL CASES</b>	<b>HON. ROBERT B. KUGLER</b>

**CORRECTED NOTICE TO TAKE VIDEOTAPED ORAL DEPOSITION**

TO: **Clem C. Trischler, Esq.,  
PIETRAGALLO GORDON ALFANO BOSICK & RASPANTI, LLP  
38<sup>TH</sup> Floor, One Oxford Centre  
Pittsburgh, Pennsylvania 15219**  
*Attorneys for Defendants Mylan Pharmaceuticals Inc. (hereinafter "Defendants").*

Please take notice that pursuant to Federal Rule of Civil Procedure 30, and other applicable Rules, including the Local Civil Rules, and the applicable Orders of the Court, Plaintiffs, by and through their counsel, will take the videotaped deposition of Wayne Talton, Head of Global Regulatory Affairs, on February 11 and 12, 2021, at 9:00 a.m. eastern standard time, and continuing until completion, at Pietragallo Gordon Alfano Bosick & Raspanti, LLP, 38<sup>th</sup> Floor, One Oxford Center, Pittsburgh, Pennsylvania 15219, via zoom, in accordance with the Fact Witness Deposition Protocol, Case Management Order #20, filed November 17, 2020 (Document 632). The deposition shall first address the Federal Rule of Civil Procedure 30(b)(6) topics listed on Exhibit A attached, followed by deposition of the witness in his individual capacity. The witness shall produce the documents requested at Exhibit B, attached hereto, at least 5 days in advance of the deposition.

Pursuant to the meet and confer between the parties, a translator will not be provided.

**TAKING ATTORNEYS FOR PLAINTIFFS:**

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Philadelphia, PA 19103  
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The videotaped deposition will be taken before a person authorized by law to administer oaths, pursuant to Rule 28 of the Federal Rules of Civil Procedure.

January 29, 2021

**PLAINTIFFS' CO-LEAD COUNSEL**

By: /s/John R. Davis  
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**EXHIBIT A**

**30(B)(6) TOPICS**

*On behalf of Mylan Pharmaceuticals Inc.:*

*Communications with Regulatory Agencies*

32. The communications with any regulatory authority, including but not limited to the FDA, with regard to the use of solvents, and the Tetrazole ring formation step, in the manufacturing process for Mylan's valsartan API.

33. Mylan's communications with regulatory authorities, including the FDA, with regard to the actual or potential contamination of Mylan's valsartan API with nitrosamines including NDMA and NDEA.

34. Mylan's communications with regulatory authorities, including the FDA, with regard to the actual or potential contamination of Mylan's valsartan finished dose with nitrosamines including NDMA and NDEA.

35. Mylan's filings with regulatory authorities, including the FDA, regarding manufacturing process changes for Mylan's Valsartan API Drug Master Filings.

*Mylan's Communications with Finished Dose Customers and Downstream Customers*

40. Mylan's product recall for valsartan API, including who Mylan communicated with, how, about what, and the retention of recalled or sequestered Mylan valsartan API, including as a component of finished dose.

41. Mylan's product recall for valsartan API, including who Mylan communicated with, how, about what, and the retention of recalled or sequestered Mylan valsartan finished dose.

**EXHIBIT B**

**DOCUMENT REQUESTS**

1. The most recent resume/Curriculum Vitae and LinkedIn profile for Wayne Talton.
2. The complete production of Wayne Talton's relevant custodial documents, including those maintained on personal computers or electronic devices, to the extent not produced prior.

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**CERTIFICATE OF SERVICE**

I hereby certify that on January 29, 2021, I caused the foregoing to be electronically filed with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

PLAINTIFFS' CO-LEAD COUNSEL

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